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May 10, 2017

Magistrate Judge Sarah Netburn
United States District Court,
Southern District of New York
United States Courthouse
40 Centre Street
New York, New York 10007

Re: Continental Casualty Co. v. Al Qaeda Islamic Army, 04 Civ. 5970
In Re Terrorist Attacks on September 11, 2001 03 MDL 1570

Dear Judge Netburn:

This firm represents the plaintiffs in *Continental Casualty Co. v. Al Qaeda*, 04 Civ. 5970, which is part of the multi-district litigation *In Re Terrorist Attacks on September 11, 2001*, 03 MDL 1570. The Continental Plaintiffs' motion for a default judgment against defendant Islamic Republic of Iran as to liability was granted in an order dated January 5, 2017 and they will shortly be filing a motion for the assessment of damages against Iran. In connection with that motion, the Continental Plaintiffs intend to file, as exhibits, schedules identifying their insureds and the amounts paid to those insureds in compensation for property, business interruption and related losses resulting from the September 11th terrorist attacks.

In order to protect the identity of their insureds from public disclosure, the Continental Plaintiffs respectfully request the Court's permission to file these schedules under seal. Similar relief has previously been granted to the plaintiffs in *Federal Insurance Insurance Co., et al. v. al Qaida, et al.*, 03 Civ. 6978 (one of those orders, dated May 5, 2005, is enclosed).

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Respectfully submitted,



Robert M. Kaplan

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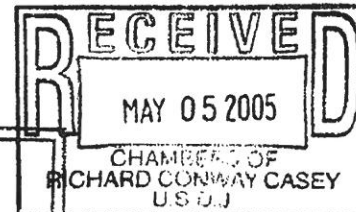
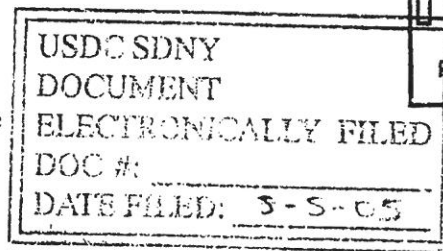
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May 4, 2005

VIA FEDERAL EXPRESS

The Honorable Richard C. Casey
United States District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1950
New York, NY 10007-1312



Re: *In Re: Terrorist Attack on September 11, 2001*, MDL No. 1570;
Federal Insurance Company et al. v. al Qaida, et al., 03 CV 6978

Dear Judge Casey:

As Your Honor is aware, this firm represents the Plaintiffs in *Federal Insurance Co., et al. v. al Qaida, et al.*, 03 CV 6978, one of the consolidated cases comprising *In Re: Terrorist Attack of September 11, 2001*, 03 MDL 1570. In an effort to make this case more manageable for the Court and all parties involved, the *Federal* Plaintiffs will shortly be seeking entries of default against several hundred defendants who were served some time ago, but have not appeared to defend the claims asserted against them.

In connection with the default process the *Federal* Plaintiffs intend to file schedules detailing their insureds, and the amounts paid to those insureds in compensation for property, business interruption, and related losses resulting from the September 11, 2001 Attack, as Exhibits to the default papers.

This Court has previously authorized the *Federal* Plaintiffs to file schedules identifying their insureds under seal, in order to protect the identity of those insureds from public disclosure. Copies of the Court's prior Orders relating to the filing of such schedules under seal are attached hereto for the Court's convenience. Consistent with these prior Orders, the *Federal* Plaintiffs

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write to respectfully request the Court's permission to file the schedules to be attached as Exhibits to the default filings under seal.

I thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

COZEN O'CONNOR


By: J. Scott Tarbutton

JST

cc: Steven A Cozen, Esq.
Elliott R. Feldman, Esq.
Sean P. Carter, Esq.
All MDL Counsel

Application granted
5/5/05



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